

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LIBERTY MUTUAL INSURANCE COMPANY,

Plaintiff,

V.

THE BLACK & DECKER CORPORATION,
BLACK & DECKER, INC., BLACK & DECKER
(U.S.) INC., EMHART CORPORATION, and
EMHART, INC.,

Defendants.

CIVIL ACTION
No. 96-10804-DPW

1:04-CV-10683-DPW
(W.W. Cross, NH
[Tack pile])

Witness List

W.W. Cross Tack Pile (Jaffrey, N.H.)

Pursuant to Fed.R.Civ.P. 26(a)(3)(A), Liberty Mutual Insurance Company designates the following individuals as trial witnesses:

John E. Morton
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Bedford, NH 03110

Arthur J. Christian
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Franklin E. Woodard, Ph.D., P.E.
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Charity Connor, Esq.
Senior Project Manager
Computer Sciences Corporation
Risk Management, Claims & Legal Solutions
1617 JFK Boulevard, Suite 700
Philadelphia PA 19103
(215) 814-6300

Keeper of the Records for the Town of Jaffrey Departments, Offices and Agencies

Keeper of the Records for Federal, State and Local Environmental Agencies

Keeper of the Records for Environmental Consultants, Engineers and Other
Vendors Who Performed Activities at the W.W. Cross Site in Jaffrey, New
Hampshire

Keeper of the Records for Third Party Documents Produced During the Course of
this Litigation

Keeper of the Records of Invoices Rendered With Respect to the W.W. Cross Site,
Jaffrey, New Hampshire

Keeper of the Records for Newspaper Articles and Publications Regarding the W.W.
Cross Site, Jaffrey, New Hampshire

Keeper of the Records for Photographs Regarding the W.W. Cross Site, Jaffrey, New
Hampshire

Keeper of the Records for Maps and Diagrams Regarding the W.W. Cross Site,
Jaffrey, New Hampshire

LIBERTY MUTUAL INSURANCE COMPANY

By its attorneys,

/s/ Ralph T. Lepore III

Ralph T. Lepore, III (BBO #294420)
Janice Kelley Rowan (BBO #265520)
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(617) 523-2700

Dated: March 14, 2005

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March 2005 I caused a copy of the foregoing document to be served by hand upon Jack R. Pirozzolo, Esq., counsel for defendants, at Willcox, Pirozzolo and McCarthy, P.C., 50 Federal Street, Boston, MA 02110.

/s/ James M. Tierney
James M. Tierney

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